

EXHIBIT D

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From: **Jennifer Salvatore** <salvatore@spplawyers.com>
Date: Tue, May 4, 2021 at 8:07 AM
Subject: Re: John Doe 1 & 2 v Orchard Lake Schools, et al
To: Rheaume, Thomas <TRheaume@bodmanlaw.com>
Cc: Doute, Katherine <KDoute@bodmanlaw.com>, Van Dusen, Thomas <TVanDusen@bodmanlaw.com>, ala@starrbutler.com <ala@starrbutler.com>, jmcnamara@thrunlaw.com <jmcnamara@thrunlaw.com>

Thanks Tom. Can we have a call about this? This is really really broad as it essentially keeps completely out of the public record any and all documents, discussion, references to any topics that your client chooses to designate as confidential. It's not appropriate nor do I think it's likely to be approved by the court.

If there are names that need to be redacted or other portions of personnel documents that contain truly confidential Information, let's discuss that. But we are not willing to sign this Proposed order, particularly given the nature of the issues in this case and the public importance of transparency on such issues.

If we need to address this with Judge Hood, let me know. We would like to get moving on the document production.

On Mon, May 3, 2021 at 8:14 AM Rheaume, Thomas <TRheaume@bodmanlaw.com> wrote:

Counsel,

Attached is a protective order regarding AOD records. Please let me know if it is acceptable to you.

Tom

Thomas J Rheaume, Jr.
BODMAN PLC
6th Floor at Ford Field
1901 St. Antoine Street
Detroit, Michigan 48226
mobile (preferred): 313-268-3951

office: 313-392-1074

email: trheaume@bodmanlaw.com
My biography on bodmanlaw.com

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